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July 7, 2021

Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

7/8/21
The Court will allow my sixty day adjournment
September 8, 2021 at 12 noon. There will be
no further adjournments

Re: United States v. Salvatore Tagliaferro
19 CR. 472 (PAC)

Do ordered
Paul A. Crotty
USDC


Dear Judge Crotty:

I respectfully write today to request a sixty-day continuance of sentencing currently scheduled for July 27, 2021. A continuance is necessary as it will provide counsel with the time needed for the development of mitigating factors we intend to include in our sentencing submission. Mr. Tagliaferro has been fully compliant with the terms of his appearance bond and has been instrumental in assisting counsel in our preparation.

We have been advised by A.U.S.A. Thomas McKay that the Government is prepared to go forward with sentencing on July 27, 2021. We, however, will not be prepared to go forward on that date.

Accordingly, the undersigned respectfully requests a sixty day adjournment of Mr. Tagliaferro's sentencing or a date thereafter that is convenient to the Court.

Respectfully submitted,



Richard H. Rosenberg
Michael K. Bachrach
Attorneys for Salvatore Tagliaferro

cc.: all parties (ECF and e-mail)